UNITED STATES DISTRICT COURT DISTRICT OF NEW JERSEY

UNITED STATES OF AMERICA

CRIMINAL COMPLAINT

v.

Hon. Dougals A. Arpert

WILLIAM A. BURROWS

Mag. No. 12-5036 (DEA)

I, Ignace Ertilus, being duly sworn, state the following is true and correct to the best of my knowledge and belief. On or about October 25, 2011, in Ocean County, in the District of New Jersey, and elsewhere, defendant WILLIAM A. BURROWS

did knowingly distribute child pornography, as defined in Title 18, United States Code, Section 2256(8)(A), which images were mailed, shipped, and transported using any means and facility of interstate and foreign commerce and in and affecting interstate and foreign commerce by any means, including by computer,

in violation of Title 18, United States Code, Section 2252A(a)(2) and (b)(1) and Title 18, United States Code, Section 2.

I further state that I am a Special Agent with the Federal Bureau of Investigation and that this complaint is based on the following facts:

SEE ATTACHMENT A

continued on the attached page and made a part hereof.

Ignace Ertilus, Special Agent Federal Bureau of Investigation

Sworn to before me and subscribed in my presence, April **26**, 2012 at Trenton, New Jersey

HONORABLE DOUGLAS E. ARPERT UNITED STATES MAGISTRATE JUDGE

Signature of Judicial Officer

ATTACHMENT A

AFFIDAVIT

- I, Ignace Ertilus, a Special Agent with the Federal Bureau of Investigation ("FBI"), having conducted an investigation and discussed this matter with other law enforcement officers who have participated in this investigation, have knowledge of the following facts:
 - 1. On several occasions beginning on or about March 25, 2011 through and including October 25, 2011, law enforcement agents accessed a publicly available peer-to-peer ("P2P") file sharing network on the internet and determined that an individual using an Internet Protocol Address ("IP Address") registered to a WILLIAM BURROWS at an address located in Lanoka Harbor, Ocean County, New Jersey, had video and image files depicting child pornography in his shared directories on the P2P network. Because BURROWS had designated these child pornography files as shared files, he made the files available for downloading by his community of friends on the P2P network. It was pursuant to this file sharing that BURROWS distributed child pornography to law enforcement agents, as described in greater detail below.
 - 2. On or about October 25, 2011, an undercover agent downloaded child pornography files from an individual using an IP Address registered to WILLIAM BURROWS. Three of the files downloaded by law enforcement agents from this individual had filenames and descriptions as follows:

	BBS repotes
0-456.jpg	This image depicts an adult male inserting his erect penis into the anus of a prepubescent boy. The boy is lying on his back naked while the adult male is sitting between the boy's legs. Neither the adult male's face nor the boy's face is visible.
213.jpg	This image depicts an adult male performing oral sex on a prepubescent boy. The boy is lying naked on his back, while the adult male has the boy's penis in his mouth.
aaaa boylove gay pedo preteen boy sex child porn 143 (1).jpg	This image depicts two prepubescent boys engaged in oral sex. One boy is lying naked on a bed, and there is a plaid pillow behind him. The first boy has his penis in the other boy's mouth. The second boy is lying between the first boy's legs. Only the head and face of the second boy are visible in the image.

3. On or about April 12, 2012, federal law enforcement officers executed a search warrant at WILLIAM BURROW's home located in Lanoka Harbor, Ocean County, New Jersey. At the scene of the search, agents recovered a computer belonging to BURROWS.

4. During the execution of the search warrant, on or about April 12, 2012, law enforcement agents interviewed WILLIAM BURROWS at his place of employment. BURROWS admitted, in substance and in part, that (1) he downloads and distributes child pornography using his computer and the P2P network; (2) the P2P network is password protected (BURROWS provided his P2P network password to law enforcement agents); (3) he is the only person in his home who uses the P2P network; and (4) he masturbates to child pornography.

Based upon my training and experience and the admissions made by BURROWS, the images described in paragraph 2 above were downloaded from the internet.